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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 HAYRI OLIVAS-ARENAS, individually,

Case No.: 2:19-cv-00624-RFB-VCF

11 Plaintiff,

12 vs.

13 HOBBY LOBBY STORES, INC. d/b/a
14 HOBBY LOBBY #679 d/b/a HOBBY
15 LOBBY; 2199 NORTH RAINBOW
16 BOULEVARD HOLDINGS, LLC; DOES 1
17 through 100 and ROE CORPORATIONS 1
through 100, inclusive,

18 Defendants.

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINE
(EIGHTH REQUEST)**

19 Plaintiff HAYRI OLIVAS-ARENAS (“Plaintiff”), by and through her attorneys of record,
20 FARHAN R. NAQVI and PAUL G. ALBRIGHT of the law firm NAQVI INJURY LAW, and
21 Defendants HOBBY LOBBY STORES, INC. d/b/a HOBBY LOBBY #679 d/b/a HOBBY
22 LOBBY; 2199 NORTH RAINBOW BOULEVARD HOLDINGS, LLC (hereinafter collectively
23 referred to as “Defendants”), by and through their attorney of record, MICHAEL P. LOWRY of
24 the law firm WILSON ELSER MOSKOWITZ EDELMAN & DICKER LLP, submit this
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1 **STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINE (EIGHTH**
2 **REQUEST)** pursuant to LR 26-4 for the Court's consideration.

3 **I.**

4 **DISCOVERY COMPLETED TO DATE**

- 5 1. A Rule 26(f) Case Conference was held and a Discovery Plan/Scheduling Order was filed.
6
7 2. Plaintiff has made initial disclosures, and supplements thereto.
8
9 3. Defendants have made initial disclosures, and supplements thereto.
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11 4. Plaintiff has propounded a first set of requests for production to Defendant 2199 North
12 Rainbow Boulevard Holdings, LLC, to which responses were provided.
13
14 5. Plaintiff has propounded a first set of requests for production to Defendant Hobby Lobby
15 Stores, Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were
16 provided.
17
18 6. Plaintiff has propounded a first set of interrogatories to Defendant Hobby Lobby Stores,
19 Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
20
21 7. Defendant 2199 North Rainbow Boulevard Holdings, LLC has propounded a first set of
22 interrogatories to Plaintiff, to which responses have been provided.
23
24 8. Defendant 2199 North Rainbow Boulevard Holdings, LLC has propounded a first set of
25 requests for production to Plaintiff, to which responses have been provided.
26
27 9. Plaintiff has propounded a second set of interrogatories to Defendant Hobby Lobby Stores,
28 Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
29
30 10. Plaintiff has propounded a third set of interrogatories to Defendant Hobby Lobby Stores,
31 Inc. d/b/a Hobby Lobby #679 d/b/a Hobby Lobby, to which responses were provided.
32
33 11. Subpoena duces tecum have been sent to various facilities and entities requesting records.



- 1 12. Deposition of Hobby Lobby employee, Apolinar Lopez.
- 2 13. Deposition of Plaintiff.
- 3 14. A site inspection has been performed.
- 4 15. The parties have made initial and rebuttal expert disclosures.

II.

DISCOVERY TO BE COMPLETED

- 8 1. Production of documents by Defendants.
 - 9 2. Deposition of Defendants' FRCP 30(b)(6) witness.

III.

WHY DISCOVERY CANNOT BE COMPLETED IN THE TIME PROVIDED BY THE SCHEDULING ORDER

The sole remaining delay in this file stems from the court's October 20, 2020 ruling on a motion for protective order. The parties realized the ruling could affect another area of discovery, but disagreed as to the effect's extent. To resolve that, they then obtained the audio recording of the hearing so as to avoid further motion work. Unfortunately, this recording was misrouted within defense counsel's office. This resulted in a delay to reviewing the recording, resolving the disagreement as to the extent of the ruling, and then a delay to resolving the potential additional discovery answers. Defense counsel has now resolved these delays and is working with the clients to assess their need for potential, additional discovery responses and then to proceed with the 30(b)(6) deposition. No further discovery is anticipated.

IV.

PROPOSED SCHEDULE FOR COMPLETING REMAINING DISCOVERY

DISCOVERY	Current Deadline	PROPOSED DEADLINE
Interim Status Report	Closed	Closed
Initial Expert Disclosure	Closed	Closed
Rebuttal Expert Disclosure	Closed	Closed
Close of Discovery	February 8, 2021	April 9, 2021
Dispositive Motions	March 8, 2021	May 7, 2021
Pretrial Order	April 8, 2021	June 7, 2021

This Stipulation to Extend is made in good faith and not for purposes of delay.

DATED this 22nd of January, 2021.

NAQVI INJURY LAW

/s/ Paul G. Albright

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DATED this 22nd of January, 2021.

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/s/ Michael P. Lowry

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Attorney for Defendants

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

1-29-2021

DATED: _____

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

